

No. PD-0881-20

**IN THE
COURT OF CRIMINAL APPEALS
OF THE STATE OF TEXAS**

FILED
COURT OF CRIMINAL APPEALS
7/22/2021
DEANA WILLIAMSON, CLERK

CRYSTAL MASON,

Appellant,

v.

STATE OF TEXAS,

Respondent.

From the Second Court of Appeals,
Cause No. 02-18-00138-CR

Trial Court Cause No. 148710D
From the 432nd District Court of Tarrant County, Texas
The Honorable Ruben Gonzalez, Jr. Presiding

**Unopposed Motion for Admission *Pro Hac Vice*
of Christine P. Sun**

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Counsel for Amici Curiae

**Pro Hac Vice Admission Pending*

TO THE HONORABLE COURT OF CRIMINAL APPEALS OF THE STATE OF TEXAS:

Pursuant to Texas Government Code Section 82.001, *et seq.* and Rule XIX of the Rules Governing Admission to the Bar of Texas, non-resident attorney Christine P. Sun files this Unopposed Motion for Admission *Pro Hac Vice* (“Motion”) and respectfully requests that this Court enter an order authorizing Christine P. Sun to appear *pro hac vice* before this Court. In support of this Motion, Ms. Sun respectfully states as follows:

1. Ms. Sun seeks permission to appear *pro hac vice* as counsel for *amici curiae* Donald B. Ayer, Jonathan S. Feld, and other former prosecutors in the above-referenced matter. Ms. Sun is the Legal Director of States United Democracy Center, 3749 Buchanan Street, No. 475165 San Francisco, CA 94147-3103, Telephone: (615) 574-9108, Email: christine@statesuniteddemocracy.org. Ms. Sun’s California State Bar Number is 218710.

2. Ms. Sun will be associated in this proceeding with Neal S. Manne, a resident attorney whose Texas Bar Number is 12937980. Mr. Manne is an attorney licensed in Texas who is a partner at the law firm of Susman Godfrey L.L.P., 1000 Louisiana St., Suite 5100, Houston, Texas 77002-5096, Telephone: (713) 651-9366, Facsimile: (713) 654-6666, E-mail: nmanne@susmangodfrey.com.

3. Ms. Sun has not appeared or sought leave to appear in any cases in Texas court within the past two years.

4. Ms. Sun is an active member in good standing with the following states and federal courts:

States:

California

New York

Federal Courts:

Northern District of California

Central District of California

Middle District of Tennessee

Eastern District of Tennessee

District of Colorado

Ninth Circuit Court of Appeals

U.S. Supreme Court

5. Ms. Sun has not been the subject of disciplinary action by the Bar or the courts of any jurisdiction in which Ms. Sun is licensed in the past five years.

6. Ms. Sun has not been denied admission to the courts of any State or to any federal court during the last five years.

7. Ms. Sun attests that she is familiar with the State Bar Act, the State Bar Rules, and the Texas Disciplinary Rules of Professional Conduct governing the conduct of members of the State Bar of Texas. Ms. Sun attests that she will at all times abide by and comply with these rules as long as the Texas proceeding is pending, and she has not withdrawn as counsel in the proceeding.

8. Pursuant to the Texas Rules Governing Admission to the Bar of Texas, Rule XIX(a), Ms. Sun has filed an application for admission *pro hac vice* with the Texas Board of Law Examiners and paid the \$250.00 filing fee. The Texas Board of Law Examiner's letter acknowledging the application is attached hereto as Exhibit A.

9. Pursuant to Rule XIX(b) of the Rules Governing Admission to the Bar of Texas, Ms. Sun submits Mr. Manne's motion concurrently with this Motion, which contains a statement that he finds Ms. Sun to be a reputable attorney and recommending that Ms. Sun be granted permission to participate in this matter before this Court.

10. The undersigned counsel has consulted with counsel for Respondent. Respondent does not oppose this motion.

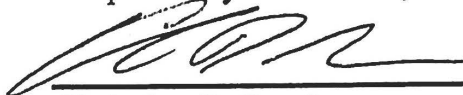
Ms. Sun respectfully requests that the Court grant this Motion for Admission *Pro Hac Vice* and enter an order allowing Ms. Sun to participate as an attorney for *amici curiae* in the above-captioned matter.

///

Dated: July 19, 2021

Julie Veroff*
CA Bar No. 310161
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Respectfully submitted,



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**Pro Hac Vice Admission Pending*

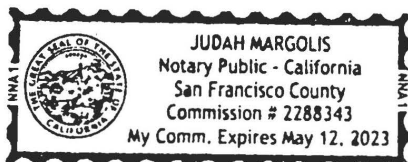
CALIFORNIA ACKNOWLEDGMENT

CIVIL CODE § 1189

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of San Francisco }
On July 19, 2021 before me, Judah Margolis, Notary Public
Date Here Insert Name and Title of the Officer
personally appeared Christine P. Sun
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person~~(s)~~ whose name~~(s)~~ is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity~~(ies)~~, and that by his/her/their signature~~(s)~~ on the instrument the person~~(s)~~, or the entity upon behalf of which the person~~(s)~~ acted, executed the instrument.



I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature [Signature]
Signature of Notary Public

Place Notary Seal and/or Stamp Above

OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

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Title or Type of Document: In the Court of Criminal Appeals of the state of Texas

Document Date: July 19, 2021 Number of Pages: 4

Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

☐ Corporate Officer – Title(s): _____

☐ Partner – ☐ Limited ☐ General

☐ Individual ☐ Attorney in Fact

☐ Trustee ☐ Guardian or Conservator

☐ Other: _____

Signer is Representing: _____

Signer's Name: _____

☐ Corporate Officer – Title(s): _____

☐ Partner – ☐ Limited ☐ General

☐ Individual ☐ Attorney in Fact

☐ Trustee ☐ Guardian or Conservator

☐ Other: _____

Signer is Representing: _____

EXHIBIT A

Board of Law Examiners
Appointed by the Supreme Court of Texas

July 19, 2021

CHRISTINE P. SUN

Via: E-Mail

Acknowledgment Letter
Non-Resident Attorney Fee

According to Texas Government Code §82.0361, "a nonresident attorney requesting permission to participate in proceedings in a court in this state shall pay a fee of \$250 for each case in which the attorney is requesting to participate."

This Acknowledgement Letter serves as proof that the Board of Law Examiners has received \$250 in connection with the following matter:

Non-resident attorney: CHRISTINE P. SUN

Case: PD-0881-20

Texas court or body: CRYSTAL MASON v. STATE OF TEXAS, PD-0881-20, Court of Criminal Appeals

After satisfying the fee requirement, a non-resident attorney shall file a motion in the Texas court or body in which the non-resident attorney is requesting permission to appear. The motion shall contain the information and statements required by Rule 19(a) of the Rules Governing Admission to the Bar of Texas. The motion must be accompanied by this Acknowledgment Letter and by a motion from a resident practicing Texas attorney that contains the statements required by Rule 19(b).

The decision to grant or deny a non-resident attorney's motion for permission to participate in the proceedings in a particular cause is made by the Texas court or body in which it is filed.

For more information, please see Rule 19 of the Rules Governing Admission to the Bar of Texas and §82.0361, of the Texas Government Code, which can be found on the Board's website.

Cordially,



Nahdiah Hoang
Executive Director

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CERTIFICATE OF CONFERENCE

I certify that I conferred with counsel for the Respondent regarding the substance of the foregoing Motion. Respondent's counsel has indicated that they are unopposed to the relief requested in this Motion. Accordingly, this Motion is submitted to the Court for its determination.

/s/ Christine P. Sun
Christine P. Sun

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 20th day of July, 2021,
a true and correct copy of the foregoing Unopposed Motion for Admission *Pro*
Hac Vice of Christine P. Sun was served electronically through the court's
electronic filing system on the following counsel of record:

SHAREN WILSON
Criminal District Attorney
Tarrant County, Texas

JOSEPH W. SPENCE
Assistant Criminal District Attorney
Chief, Post-Conviction

JOHN E. MESKUNAS
Assistant Criminal District Attorney
Tim Curry Criminal Justice Center
401 W. Belknap
Fort Worth, Texas 76196-0201
(817) 884-1687
State Bar No. 24055967
ccaappellatealerts@tarrantcountytexas.gov

/s/ Christine P. Sun
Christine P. Sun

253339844

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Tanya McGinnis on behalf of Neal Manne
Bar No. 12937980
tmcginnis@susmangodfrey.com
Envelope ID: 55539759
Status as of 7/21/2021 8:47 AM CST

Case Contacts

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Robert R.Landicho		rlandicho@velaw.com	7/20/2021 5:29:15 PM	SENT
Ashley Wiens		awiens@velaw.com	7/20/2021 5:29:15 PM	SENT
Joseph Wilson Spence	18913500	jwspence@tarrantcountytx.gov	7/20/2021 5:29:15 PM	SENT
Stacey Soule		information@spa.texas.gov	7/20/2021 5:29:15 PM	SENT
Rebecca HarrisonStevens		beth@texascivilrightsproject.org	7/20/2021 5:29:15 PM	ERROR
Helena Faulkner		coaappellatealerts@tarrantcountytx.gov	7/20/2021 5:29:15 PM	SENT
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Kathleen R.Hartnett		khartnett@cooley.com	7/20/2021 5:29:15 PM	SENT
Julie Veroff		jveroff@cooley.com	7/20/2021 5:29:15 PM	SENT
Darina Shtrakhman		dshtrakhman@cooley.com	7/20/2021 5:29:15 PM	SENT

Associated Case Party: Crystal Mason

Name
Thomas Buser-Clancy
Emma Hilbert
Sophia LinLakin
Dale E.Ho

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Tanya McGinnis on behalf of Neal Manne
Bar No. 12937980
tmcginnis@susmangodfrey.com
Envelope ID: 55539759
Status as of 7/21/2021 8:47 AM CST

Associated Case Party: Crystal Mason

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